

BRACEWELL

March 9, 2021

VIA ECF

Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

MEMO ENDORSED

Re: United States v. Abdel-Wadood, 19 Cr. 233

Dear Judge Kaplan:

I write with the government's consent to request a modification of Mustafa Abdel-Wadood's bail conditions. At present, Mr. Abdel-Wadood's residence is in Manhattan and his travel is limited to the Southern and Eastern Districts of New York. His wife and daughter live in Dubai, where his daughter is in high school, and they have been together as a family only during school vacations. Further proceedings in his case have been delayed pending the extradition of the lead defendant from England, which has been a slow process.

The proposed modification would allow Mr. Abdel-Wadood to travel to Miami, Florida, from March 28, 2021, to March 31, 2021, to join his family and several close friends there for a brief vacation.

As noted, the government has consented to the proposed modification. So has Mr. Abdel-Wadood's Probation Officer (DayShawn Bostic), who reports that Mr. Abdel-Wadood has been fully compliant with his release conditions for the past 22 months. If the request is approved, it is understood that the current geographic limits would "spring back" upon Mr. Abdel-Wadood's return to New York.

I thank the Court for its consideration of this request.

Respectfully submitted,
/s/ Paul Shechtman

Paul Shechtman

PS:wr

cc: AUSA Andrew Thomas
P.O. DayShawn Bostic

Granted on consent

SO ORDERED

Lew Kaplan
LEWIS A. KAPLAN, USDI

AUSTIN CONNECTICUT DALLAS DUBAI HOUSTON LONDON NEW YORK SAN ANTONIO SEATTLE WASHINGTON DC

3/9/21

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